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July 9, 2020

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of the Kingdom of Saudi Arabia (“Saudi Arabia”) to request an extension of the 45-day deadline to complete the searches set forth in the Court’s May 27, 2020 Opinion and Order (“May 27 Order”) (Dkt. No. 6244).

The May 27 Order required Saudi Arabia to “search for and produce documents from the government Offices of Prince Abdulaziz regarding the assignments and compensation of [Fahad Al] Thumairy.” *Id.* at 6. Saudi Arabia has completed that search and produced documents to Plaintiffs on July 8, 2020.

The May 27 Order further directs the parties “to meet-and confer regarding the locations of any unproduced records of [Musaed Al] Jarrah’s travel” and “to meet-and-confer . . . regarding the locations and parameters of an additional search for documents regarding [Smail] Mana’s duties and responsibilities.” *Id.* at 10, 13-14. It also states that “Saudi Arabia is directed to search for and produce documents identified above within 45 days of this Order,” *i.e.*, July 11, 2020. *Id.* at 15.

The parties conducted their meet-and-confer conference on June 8, 2020. During that call, Plaintiffs requested that Saudi Arabia conduct a further search of the Ministry of Foreign Affairs for documents pertaining to Al Jarrah’s travel during the relevant time period. Although the Court held in its July 22, 2019 Opinion & Order regarding supplemental discovery that Saudi Arabia has no obligation to search for Al Jarrah-related documents at this Ministry, Saudi Arabia has agreed to conduct this additional limited search.

Given the current global health crisis that has disrupted operations at the Ministry of Foreign Affairs and prevented us from traveling to Saudi Arabia to assist with this search, Saudi

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Arabia will be unable to complete that search by July 11. Accordingly, Saudi Arabia respectfully requests a 45-day extension to complete its search of the Ministry of Foreign Affairs for documents pertaining to Al Jarrah's travel during the relevant time period. Plaintiffs have consented to this request for an extension.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)